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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Antoine El Habre,

Plaintiffs,

v.

Marco Rubio,

Defendant.

Case No. 2:25-cv-00142-CDS-EJY

**Stipulation and Order to Extend Time
to Answer**

(Second Request)

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiff Antoine El Habre, and Federal Defendant Marco Rubio, through undersigned counsel, hereby stipulate and agree as follows:

Plaintiff filed his Complaint for Declaratory and Injunctive Relief on January 23, 2025. ECF No. 1.

Plaintiff served Federal Defendant with a copy of the Summons and Complaint via U.S. priority mail on January 30, 2025.

The current deadline for Federal Defendant to respond to Plaintiff's Complaint is April 30, 2025.

On April 29, 2025, undersigned counsel for Plaintiff and Federal Defendant agreed to a 30-day extension of time for Federal Defendant to continue reviewing the record and coordinating with agency counsel about a potential resolution to this matter. The standard for extending time is good cause. *See* FRCP 6(b)(1)(A).

1 Accordingly, the parties, through undersigned counsel, submit this stipulation to a
2 30-day extension from April 30, 2025, to **May 30, 2025**, for Federal Defendant to file an
3 answer or otherwise respond to the Complaint. This is Federal Defendant's second request
4 for an extension of time.

5 This stipulated request is filed in good faith and not for the purposes of undue delay.

6 Respectfully submitted this 29th day of April 2025.

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SIGAL CHATTAH
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/s/ Virginia T. Tomova
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Attorneys for the Federal Defendant

20 **IT IS SO ORDERED:**

21 
22 UNITED STATES MAGISTRATE JUDGE

23 **DATED:** April 29, 2025